

SepT. 30, 2024

JAMES COLE

# 41167066

H.A.F.

P.O. BOX 5000

BRUCELOW HILLS, W. VA. 26525

Clerk.

U.S. Courts

601 MARKET STs

Phila. Pa. 19106

re: U.S. v. Cole, Crim. No 91-570-02

Dear CLERK,

Please, hand this Up!

James Cole

James Cole

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

Crim. No 91-570-02

VS-

DIAMONJ, J.

James Cole,

DEFENDANT'S REPLY BRIEF

The government is right, defendant have no RIGHT To appointed however, pursuant to the Principles of Fundament fairness, if my co-defendat was appointed counsel, I should have counsel appointed also.

In fact, Defendant James Cole was convicted, by a "General Jury Verdict" on an indictment charging conspiracy to possess with intent to distribute, cocaine, crack, heroin, U.S. v. Cole, 91-<sup>\*</sup>570-02. However, the jury was allowed to only find defendant "Cole" guilty, without any specific drug he "Cole" possess, delivered, as part of the conspiracy.

Finally, Cole was sentence, as argue about the same. A General Jury verdict of life, and no count, the court specified, which count, count[s] he the court based, Cole's life sentence. See U.S. v. Barnes, 158 F.3d 662 (2nd Cir. 1998)("General Jury Verdict.")

The content and caption suggest that the conspiracy count was intended to conclude all-narcotic-related activities of the J.B.M. enterprise engaged in during its existence.


<sup>\*</sup> Jury Verdict Sheet

The court[s] jury instrucion, demand the Jury need only found Cole, engaged in criminal activity of the J.B.M. See Court's Jury Supplemental Question. Tr. 10-22-1993 Katz, J.

As such, defendant argues, if defendant Thounton, was appointed counsel on 404 of the F.S.A. Cole should also, appointed counsel.

And, I was not sentence on 21 USC § 848(b), my sentence was life. A General Jury Verdict, no-count of conviction. Cole, also has a "1B1.13(a)(6), "Apprendi and Allenyne" argument to support his newly 1B1.13(b)(6), Usually long sentence, being convict of a measurable amount of cocaine, crack, heroin, Katz, J.

WHEREFORE, I pray for appointment of counsel in all FAIRNESS.

A handwritten signature in blue ink that reads "James Cole". The signature is written in a cursive style with a horizontal line underneath the name.

James Cole



CERTIFICATE OF SERVICE

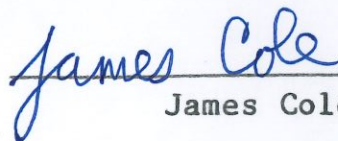
That I sent, to:

Clerk  
U.S. Courts  
601 Market Sts.  
Phila. Pa. 19106

and

R.A. Z.  
A.U.S.A.  
615 Chestnut Sts.  
Phila. Pa. 19106

This <sup>th</sup>30 day of September, 2024.

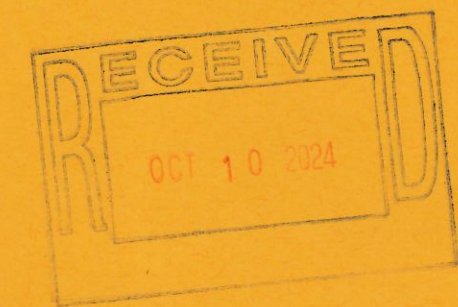
  
James Cole



James Cole  
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